

ERIC A. LIEPINS  
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**PROPOSED ATTORNEY FOR DEBTOR**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE §  
LS MOTORCARS, LLC . § Case no. 21-40441-11  
DEBTOR §  
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CHAPTER 11

**APPLICATION FOR AUTHORITY  
TO EMPLOY COUNSEL FOR DEBTOR**

**NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION OR REQUEST FOR HEARING IS FILED WITH THE UNITED STATES BANKRUPTCY CLERK, 660 N. CENTRAL EXPRESSWAY, THIRD FLOOR, PLANO, TEXAS 75074, WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF THE FILING OF THIS MOTION, UNLESS THE COURT, SUA SPONTE, OR UPON TIMELY APPLICATION OF A PARTY IN INTEREST, SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION OR REQUEST FOR HEARING.**

**IF NO OBJECTION OR REQUEST FOR HEARING IS TIMELY FILED, THE MOTION SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. THE COURT RESERVES THE RIGHT TO SET ANY MATTER FOR HEARING.**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, LS Motorcars, LLC, Debtor in the above styled and numbered cause,

and pursuant to 11 U.S.C. § 327 files this its Application for Authority to Employ Counsel for Debtor ("Application"), requesting the Court to enter an Order authorizing Debtor to employ Eric A. Liepins and the law firm of Eric A. Liepins, P.C., (collectively hereinafter referred to as the "Firm"), as counsel for the Debtor, and in support thereof would respectfully show unto the Court as follows:

1. On or about March 26, 2021 Debtor filed its Voluntary Petition for relief under Chapter 11 of the United States Bankruptcy Code and has continued in possession of its property and operation of its business as a Debtor-in-Possession pursuant to §§ 1107 and 1108 of the Bankruptcy Code.

2. The Debtor believes a variety of legal matters exist as to the assets and liabilities of the estate which require legal assistance.

3. Eric A. Liepins and the Firm have been chosen by Debtor in that they are experienced in bankruptcy matters and have represented individuals and companies in numerous proceedings before this Court and other bankruptcy courts.

4. Pursuant to Bankruptcy Rule 2014(a), the Affidavit of Eric A. Liepins is attached hereto as Exhibit "A" and attests that the Firm does not presently or hold or represent any interest adverse to the interest of the Debtor or this Estate and is disinterested within the meaning of 11 U.S.C. § 101(13) to the best of his knowledge, information, and belief.

5. The Firm has received a retainer of \$5,000 plus the filing fee.

6. The Firm has agreed to represent the Debtor on the terms set forth in this Application. The compensation to be paid to the Firm shall be based upon the following hourly rates:

Eric A. Liepins

\$275.00 per hour

Paralegals and Legal Assistants \$30.00-50.00 per hour

These hourly rates are those regularly charged by the Firm in matters by the respective partners, associates, paralegals, and legal assistants for legal services rendered in similar bankruptcy matters. The hourly rates may be modified by the Firm in the ordinary course of their business. The charges for such services are fair and reasonable and within the normal range for services rendered in similar cases within the Eastern District of Texas. The Debtor has agreed to reimburse the Firm for all reasonable out-of-pocket expenses incurred on the Debtor's behalf.

7. Debtor believes the employment of the Firm as counsel is in the best interest of the bankruptcy estate. Further, the Debtor believes it is necessary to retain them immediately for the purpose of orderly liquidating the assets, reorganizing the claims of the Estate and determining the validity of claims asserted in the Estate.

WHEREFORE, PREMISES CONSIDERED, Debtor, LS Motorcars, LLC. respectfully prays this Honorable Court enter an Order approving the employment of Eric A. Liepins and the law firm of Eric A. Liepins, P.C., as counsel for Debtor effective as of March 26, 2021, under the terms and conditions contained herein, and for such other and further relief, at law or in equity, to which Debtor may show itself justly entitled.

Respectfully submitted,

ERIC A. LIEPINS, P.C.  
12770 Coit Road, Suite 850  
Dallas, Texas 75251  
(972) 991-5591  
(972) 991-5788 - fax

BY: /s/ Eric Liepins  
ERIC A. LIEPINS, SBN 12338110

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was sent to all to all creditors and the United States Trustee, 110 College, Suite 300, Tyler, Texas 75702 United States mail on this the 26th day of March 2021.

/s/ Eric Liepins  
Eric A. Liepins

EXHIBIT "A"

AFFIDAVIT PURSUANT TO BANKRUPTCY RULE 2014(a)

STATE OF TEXAS §

COUNTY OF DALLAS §

BEFORE ME, the undersigned authority, on this day personally appeared, ERIC A. LIEPINS, being known to me to be the person whose name is subscribed to this Affidavit, and after having been duly sworn, did depose and state the following:

1. "I am the sole shareholder with the law firm of Eric A. Liepins, P.C. (hereinafter referred to as the "Firm"). I am fully authorized to make this Affidavit on behalf of the Firm. This Affidavit is made and based upon personal knowledge of the matters contained herein, and is true and correct.

2. This Affidavit is made pursuant to Bankruptcy Rule 2014(a) and is intended to disclose the Firm's representation of and connections with the Debtor herein and creditors or other parties-in-interest in this case.

3. Prior to making this Affidavit, the Firm conducted an internal conflicts check designed to identify past or present relationships with any the Debtor or any creditors.

4. Prior to the engagement of the Firm to represent the Debtor in this proceeding, the

Firm had not previously represented the Debtor or any of its principals. The Firm does not represent any creditors or parties in interest in this case, their respective attorneys and accountant, the United States Trustee, or any person employed in the office of the United States Trustee , and does not represent any other interest adverse to the Estate of the Debtor.

6. The Firm has been paid a retainer of \$5,000 plus the filing fee

FURTHER AFFIANT SAYETH NOT

/s/ Eric Liepins  
Eric Liepins

SUBSCRIBED AND SWORN TO BEFORE ME on this the 26th day of March 2021, by the said Eric A. Liepins, to certify which witness my hand and official seal.

/s/ Martha Esquino  
Notary Public, in and for the  
State of Texas

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